

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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DANIEL HERRICK, on behalf of himself  
and all others similarly situated,

ANSWER

Plaintiff,  
-against-

CV-08-5569  
(Chin, J.)

UNITED RECOVERY SYSTEMS, LP and  
JAMES A. WEST, P.C.,

Defendant(s).

-----x  
Defendant, JAMES A. WEST, P.C., by its attorney Mel S. Harris and Associates, LLC, answers plaintiff's complaint as follows:

1. Defendant acknowledges the being sued pursuant to the Fair Debt Collection Practices Act, but denies any violation thereof.

2. Defendant admits that this Court has jurisdiction over this claim.

3. Defendant admits the allegations contained in paragraph "3" of the complaint.

4. Defendant admits the allegations contained in paragraph "4" of the complaint.

5. Defendant denies knowledge or information sufficient to form a belief as to each and every allegation contained in paragraph "5" of the complaint.

6. Defendant admits the allegations contained in paragraph "6" of the complaint.

7. Defendant denies each and every allegation contained in paragraph "7" of the complaint.

8. Defendant denies each and every allegation contained in paragraph "8" of the complaint.

9. Defendant denies each and every allegation contained in paragraph "9" of the complaint.

10. Defendant denies each and every allegation contained in paragraph "10" of the complaint.

11. Defendant denies each and every allegation contained in paragraph "11" of the complaint.

12. Defendant denies each and every allegation contained in paragraph "12" of the complaint.

13. Defendant denies each and every allegation contained in paragraph "13" of the complaint.

14. Defendant denies each and every allegation contained in paragraph "14" of the complaint.

15. Defendant denies knowledge or information sufficient to form a belief as to each and every allegation contained in paragraph "15" of the complaint.

16. Defendant denies knowledge or information sufficient to form a belief as to each and every allegation contained in paragraph "16" of the complaint.

17. Defendant admits sending the correspondence annexed to the complaint as Exhibit "C," but otherwise denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "17" of the complaint.

18. Defendant denies each and every allegation contained in paragraph "18" of the complaint.

19. Defendant denies each and every allegation contained in paragraph "19" of the complaint.

20. Defendant denies each and every allegation contained in paragraph "20" of the complaint.

21. Defendant denies knowledge or information sufficient to form a belief as to each and every allegation contained in paragraph "21" of the complaint.

22. Defendant denies each and every allegation contained in paragraph "22" of the complaint.

23. Defendant denies each and every allegation contained in paragraph "23" of the complaint.

WHEREFORE, the defendant respectfully requests that plaintiff's complaint be dismissed.

Dated: New York, NY  
August 21, 2008



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TO:

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